



**Arconic Remediation**

Arconic Technical Center  
100 Technical Drive  
New Kensington, PA 15069-0001 USA

March 20, 2017

Mr. John N. Filippelli  
United States Environmental Protection Agency, Region 2  
Clean Air and Sustainability Division (CASD)  
290 Broadway, 25<sup>th</sup> Floor  
New York, New York 10007

Subject: Arconic Inc. Massena, New York Facility, USEPA I.D. No. NYD002232304 (formerly Alcoa Inc.)  
Request for Approval to Construct Cell 3 Expansion of the Chemical Waste Landfill

Dear Mr. Filippelli,

Arconic is requesting the United States Environmental Protection Agency's (USEPA's) approval of the design and approval to begin construction of the Cell 3 Expansion (Cell 3E) of the Chemical Waste Landfill at Arconic's Massena Operations. The USEPA notified Arconic, in a letter dated November 9, 2016 from Ms. Dore LaPosta to the undersigned, of the agency's approval for the re-opening of Cell 3 and that the design for the expansion of Cell 3 was under review. In addition, USEPA specified that a condition for approval to construct the expansion was partially based on approval by the New York State Department of Environmental Conservation (NYSDEC).

In a letter dated March 16, 2017 from Mr. Peter R. Taylor (NYSDEC) to Mr. Michael Elsner (Arconic), NYSDCE approved the construction of Cell 3E (see attached letter). We believe USEPA has now been provided with all documentation necessary to complete your review and approval.

Based on the current schedule of remediation activities and the limited construction season in Massena, Arconic is requesting USEPA's approval to begin construction on or before April 3, 2017. If there is anything we can do to expedite the approval process, please let me know as soon as possible.

If you have any questions or require additional information, please feel free to contact me at (724) 337-5458.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. McShea", is written over a horizontal line.

Lawrence J. McShea, P.E.  
Project Manager  
Arconic Inc.

Innovation, engineered



cc: Y. Chang, USEPA  
A. Everett, USEPA  
D. Tromp, NYSDEC (Albany)  
P. Taylor NYSDEC (Watertown)  
M. Elsner, Arconic (Massena)  
B. Cook, Arconic (Massena)  
M. Schultz, CDM Smith (Boston)  
J. Jathal, CDM Smith (Boston)  
R. Kingsley, CDM Smith (Massena)  
S. Hill, Arcadis (Syracuse)

# **NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

Division of Environmental Remediation, Region 6  
Dulles State Office Building, 317 Washington Street, Watertown, NY 13601-3787  
P: (315) 785-2513 | F: (315) 785-2422  
www.dec.ny.gov

March 16, 2017

Mr. Michael Elsner  
Arconic Massena Operations  
45 County Route 42  
P.O. Box 150  
Massena, New York 13662

**RE: 645001, Alcoa Secure Landfill, Proposed Cell 3 Expansion  
Massena (T), St. Lawrence County**

Dear Mr. Elsner:

We have reviewed your February 3, 2017, letter, including the pertinent attachments regarding CONSTRUCTION of the Cell 3 Expansion. The attachments included: the Draft Final Construction Work Plan dated February 2017, (including Appendices A-E), the Construction Quality Assurance Plan dated January 13, 2017, and the Draft Final Health and Safety Plan dated February 2017 (the Health and Safety Plan was submitted for informational purposes only and was not reviewed by the Department). As you know, the certified Contract Specifications dated June 15, 2016, and the certified Drawings dated June 15, 2016, were previously reviewed and approved in my July 25, 2016, letter to you. Those portions of the February 3, 2017 submission were not re-reviewed and the June 15, 2016, submissions will be considered part of the approved plans, reports, and specifications. We have reviewed the balance of the documents in your February 3, 2017, submission and find them acceptable. Therefore, Arconic's request to CONSTRUCT Cell 3E is approved subject to the following conditions:

- 1) All construction must be in accordance with the approved plans, reports and specifications, Part 360 effective November 24, 1999, and the conditions below. If, in any instance, conflicting requirements exist, the more stringent shall apply. The approved plans and specifications consist of:
  - a. Design Change Order 31 dated June 15, 2016,
  - b. Design Justification Memo dated June 15, 2016,
  - c. Contract Specifications dated June 15, 2016,
  - d. Design Drawings dated June 15, 2016,



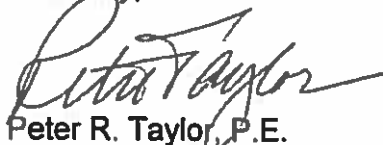
Department of  
Environmental  
Conservation

- e. Draft Final Construction Work Plan dated February 2017, excluding Appendix A (uncertified Design Drawings and Specifications) and,
  - f. Construction Quality Assurance Plan dated January 13, 2017
- 2) In accordance with NYCRR Part 360, paragraph 360-2.13(f)(2), a waiver is granted from the need to install primary leachate collection stone on the side slopes. In lieu of the primary leachate collection stone, Select Waste shall be placed in accordance with DCO16 dated August 30, 1994.
  - 3) At least five (5) business days prior to commencement of construction, Alcoa will forward to the Department a schedule outlining the time frames for construction of all major portions of the facility. Notice of the commencement of each major portion must be made to the Department at least five (5) business days in advance of the activity. Major portions include, but are not limited to, clearing and grading, placement of individual liner components, all on-site permeability or density testing activities, and the construction of any section of permanent final cover.
  - 4) By the 15<sup>th</sup> of each month, a progress report will be submitted to the Department detailing work done over the previous calendar month. The report will include the results of all quality assurance/quality control tests performed over the reporting period. At the Department's request, Alcoa shall hold meetings with Department representatives during construction of the landfill. At these meetings, the Department should be apprised of the current status of construction and any problems encountered during construction.
  - 5) All work will be done under the direction and general oversight of a professional engineer licensed to practice in New York State.
  - 6) The Department shall be notified immediately, in writing, in case of any development during construction that warrants a change to the approved engineering plans. There shall be no substantial deviation from the approved plans without the specific prior approval of the Department. All deviations shall be noted in the engineer's daily reports and weekly summaries.
  - 7) Prior to commencement of liner construction, a test pad must be constructed as described in the Cell 3 Expansion Work Plan Appendix C-Test Fill Work Plan, and the results of this test must be submitted to, and approved by, the Department. If the test pad results indicate the need for modification of the soil, Alcoa must submit a detailed report describing the procedures involved, including, but not limited to, mixing of bentonite, pug milling and moisture control and must amend the Test Fill Work Plan accordingly.

- 8) All surface water control berms, ditches, and ponds shall be vegetated and otherwise stabilized following construction.
- 9) At the completion of construction and prior to placing any waste in Cell 3E, the limits of waste placement shall be staked as indicated in the approved plans.
- 10) Prior to the disposal of waste in Cell 3E, Alcoa must receive written acceptance of the construction certification report.
- 11) By November 15, 2017, adequate frost protection shall be installed and maintained on all completed liner areas in accordance with the approved plans and specifications.
- 12) At least 90 days prior to the construction of any final cover or permanent landfill gas control structures, Alcoa shall submit to the Department, for its review and approval, an engineering report, detailed construction plans, a QA/QC plan and contract technical specifications. Unless otherwise approved by the Department, in writing, all other conditions in this section shall apply.

Please note that comments, if any, regarding the documents pertaining to the operation of Cell 3E will be provided under separate cover. Arconic must also obtain separate approvals from EPA prior to commencing construction and operation, in accordance with Arconic's November 9, 2016 TSCA approval letter from EPA.

Sincerely,



Peter R. Taylor, P.E.  
Regional Remediation Engineer

cc: Young Chang, EPA  
Adolf Everett, EPA  
Lincoln Fancher, DEC  
Rachel Gardner, DEC  
John Gorman, EPA  
Jim Haklar, EPA  
Tom Lightfoot, Arconic  
Jacquelyn Nealon, DOH  
Maureen Schuck, DOH  
Mike Schultz, CDM Smith  
Gregg Townsend, DEC  
David Tromp, DEC  
Ian Ushe, DOH